



IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

MICHAEL DAVID SILLS and  
MARY SILLS,

Plaintiffs,

v.

SOUTHERN BAPTIST  
CONVENTION, a non-profit  
corporation; DR. ED LITTON,  
Individually, and as agent and/or  
employee of SOUTHERN BAPTIST  
CONVENTION; LIFEWAY  
CHRISTIAN RESOURCES OF THE  
SOUTHERN BAPTIST  
CONVENTION, a non-profit  
corporation; JENNIFER LYELL,  
Individually and as agent and/or  
employee of LIFEWAY CHRISTIAN  
RESOURCES OF THE SOUTHERN  
BAPTIST CONVENTION and  
SOUTHERN BAPTIST  
CONVENTION; ERIC GEIGER,  
Individually and as agent and/or  
employee of LIFEWAY CHRISTIAN  
RESOURCES OF THE SOUTHERN  
BAPTIST CONVENTION and  
SOUTHERN BAPTIST  
CONVENTION; EXECUTIVE  
COMMITTEE OF THE SOUTHERN  
BAPTIST CONVENTION, a non-  
profit corporation; BART BARBER,  
Individually and as agent and/or  
employee of SOUTHERN BAPTIST  
CONVENTION; WILLIE  
MCLAURIN, Individually and as  
agent and/or employee of  
SOUTHERN BAPTIST  
CONVENTION and EXECUTIVE  
COMMITTEE OF THE SOUTHERN  
BAPTIST CONVENTION;  
ROLLAND SLADE, Individually and

Case No. 3:23-cv-00478

JUDGE WILLIAM L. CAMPBELL, JR.

Magistrate Judge Frensley

JURY TRIAL DEMANDED

as agent and/or employee of )  
 SOUTHERN BAPTIST )  
 CONVENTION and EXECUTIVE )  
 COMMITTEE OF THE SOUTHERN )  
 BAPTIST CONVENTION; THE )  
 SOUTHERN BAPTIST )  
 THEOLOGICAL SEMINARY, non- )  
 profit corporation; DR. R. ALBERT )  
 MOHLER, Individually and as agent )  
 and/or employee of THE )  
 SOUTHERN BAPTIST )  
 THEOLOGICAL SEMINARY and )  
 SOUTHERN BAPTIST )  
 CONVENTION; SOLUTIONPOINT )  
 INTERNATIONAL, INC., a )  
 corporation, individually and d/b/a )  
 GUIDEPOST SOLUTIONS; and )  
 GUIDEPOST SOLUTIONS, LLC, a )  
 limited liability corporation and agent )  
 of the Southern Baptist Convention, )  
 )  
 Defendants. )

**DEFENDANT LIFEWAY’S UNOPPOSED MOTION FOR**  
**EXTENSION OF TIME TO RESPOND TO THE COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule 6.01(a), Defendant LifeWay Christian Resources (“LifeWay”) hereby files this Unopposed Motion for Extension of Time to Respond to the Complaint. In support of its motion, LifeWay would respectfully show the Court as follows:

1. On May 11, 2023, Plaintiffs Michael David Sills and Mary Sills filed their Complaint against Defendants. *See* Doc. 1. LifeWay was served on May 16, 2023. Doc. 30.
2. Under Federal Rule of Civil Procedure 12(a)(1), LifeWay’s response to the Complaint is due on June 6, 2023.

3. On May 23, 2023, Defendants SolutionPoint International, Inc. and Guidepost Solutions, LLC moved for an extension of time to respond to Plaintiffs' Complaint up to and including July 12, 2023. Doc. 15. The Court granted their motion. Doc. 18.

4. Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule 6.01(a), Defendant LifeWay respectfully requests that the Court also extend its time to respond to the Complaint up to and including July 12, 2023. LifeWay's counsel has contacted counsel for Plaintiffs, and Plaintiffs do not oppose this Motion. No other party is impacted by the relief requested herein. Plaintiffs agree that by seeking an extension of time, LifeWay is not waiving any defense.

5. There is good cause for this extension. The Complaint raises allegations that date back as early as spring 2018 and concern numerous defendants. *See* Compl. ¶¶ 16–28, 33, 35, 38. LifeWay's counsel needs additional time to prepare LifeWay's response to the Complaint and consider defenses specific to LifeWay. Further, a single answer deadline will allow this action to proceed smoothly, as LifeWay would likely be waiting on other defendants' appearances to complete Rule 26 requirements.

WHEREFORE, LifeWay respectfully asks the Court to extend LifeWay's deadline to respond to the Complaint up to and including July 12, 2023.

Dated: May 31, 2023

Respectfully submitted,

/s/ George H. Cate, III

George H. Cate, III (BPR #12595)

Kimberly M. Ingram-Hogan (BPR #35191)

BRADLEY ARANT BOULT CUMMINGS LLP

1600 Division Street, Suite 700

Nashville, TN 37203

Telephone: (615) 244-2582

Facsimile: (615) 252-6380

gcate@bradley.com

kingram@bradley.com

*Attorneys for Defendant*

*LifeWay Christian Resources*

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing was served on the following via the Court's CM/ECF system on May 31, 2023:

Gary E. Brewer  
BREWER AND TERRY, P.C.  
1702 W. Andrew Johnson HWY  
Morristown, TN 37816-2046

John (Don) W. Barrett  
Katherine Barrett Riley  
BARRETT LAW GROUP, P.A.  
PO Box 927  
404 Court Square  
Lexington, MS 39095

Shannon M. McNulty  
CLIFFORD LAW OFFICES, P.C.  
120 N. LaSalle Street  
Suite 3100  
Chicago, IL 60602

*Counsel for Plaintiffs*

Louis Gino Marchetti, Jr.  
TAYLOR, PIGUE, MARCHETTI & BLAIR, PLLC  
2908 Poston Avenue  
Nashville, TN 37203

*Counsel for the Southern Baptist Convention*

Olivia Rose Arboneaux  
Philip N. Elbert  
Ronald G. Harris  
NEAL & HARWELL, PLC  
1201 Demonbreun Street  
Suite 1000  
Nashville, TN 37203

*Counsel for Jennifer Lyell*

John R. Jacobson  
Katherine R. Klein  
RILEY & JACOBSON, PLC  
1906 West End Avenue  
Nashville, TN 37203

Steven G. Mintz  
Terence William McCormick  
MINTZ & GOLD LLP  
600 Third Avenue  
25th Floor  
New York NY 10016

*Counsel for SolutionPoint International, Inc.  
and Guidepost Solutions, LLC*

/s/ George H. Cate, III  
George H. Cate, III